



MARTIN GROSSBACH
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* ADMITTED IN NY AND MA

MEMO ENDORSED

April 21, 2008

VIA FAX TO 914-390-4179

United States District Court
Southern District of New York
300 Quarropas Street, Room 633
White Plains, New York 10601

68cr 159(scr)

Attention: Hon. Stephen C. Robinson

Re: United States v. Zion Cohen

Dear Judge Robinson:

In furtherance of our request for permission by our client, Zion Cohen, to travel to Philadelphia, I received a return telephone call from Michael Ben'Ary, Esq. early this morning, as he was unavailable on Friday and did not receive my letter until today.

Mr. Ben'Ary indicated that the U.S. Attorney has no objection to our client traveling to Philadelphia. He indicated that if you needed to speak to him directly, he is available all day today.

Accordingly, we respectfully request that you reconsider the denial issued on Friday, which I assume was a result of not having the consent of the U.S. Attorney, and allow our client to travel to Philadelphia for the remainder of this week.

Thank you for the Court's consideration in this matter.

Very truly yours,

MARTIN GROSSBACH, P.C.

MARTIN GROSSBACH

Zion Cohen may travel to
Philadelphia through
April 26, 2008

SC (scr)

Stephen C. Robinson

MQ/ct
Encl

cc: Zion Cohen
Lawrence Maffei, Esq.

